

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

PARSON FINANCE PANAMA S.A.,

Defendant.

Adv. Pro. No. 11-02542 (CGM)

AMENDED STIPULATION AND ORDER

Plaintiff Irving H. Picard (the “Trustee”), as trustee of the substantively consolidated liquidation proceeding of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–*III*, and the chapter 7 estate of Bernard L. Madoff, and defendant Parson Finance Panama S.A. (“Defendant,” and with the Trustee, the “Parties”), by and through their respective undersigned counsel, state as follows:

WHEREAS, the Parties previously entered into a stipulation, so ordered by the Court, setting forth a schedule for Defendant's response to the complaint in this action. *See* Adv. Pro. No. 11-02542 (CGM) (Bankr. S.D.N.Y. Dec. 13, 2021), ECF No. 90;

WHEREAS, the Parties seek to amend the agreed-upon schedule due to a scheduling conflict;

IT IS HEREBY STIPULATED AND AGREED, that Defendant shall respond to the complaint in this action, Adv. Pro. No. 11-02542 (CGM) (Bankr. S.D.N.Y. Aug. 18, 2011), ECF No. 1, by February 18, 2022. If Defendant files a motion to dismiss the complaint, such motion shall set forth any and all grounds for dismissal at the pleading stage. The Trustee shall respond to the motion by April 19, 2022, and Defendant shall file its reply by May 19, 2022.

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IT IS HEREBY STIPULATED AND AGREED, that if Defendant files such a motion to dismiss the complaint, then the parties shall seek oral argument on the motion at the Court's first available convenience.

Dated: January 12, 2022
New York, New York

By: /s/ Matthew D. Feil
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*Attorneys for Irving H. Picard, Trustee for
the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate
of Bernard L. Madoff*

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*Attorneys for Defendant Parson Finance
Panama S.A.*

SO ORDERED.

Dated: January 13, 2022
Poughkeepsie, New York



/s/ Cecelia G. Morris

Hon. Cecelia G. Morris
Chief U.S. Bankruptcy Judge